

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et  
al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO SUBMIT CERTIFIED TRANSLATIONS IN CONNECTION WITH  
DOCKETED CLAIM OBJECTION RESPONSES TO BE HEARD AT THE NOVEMBER  
18, 2020 SATELLITE HEARING**

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To the Honorable United States District Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth and HTA, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

(the “Oversight Board”), as sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> respectfully file this motion in compliance with the Court’s *Order Regarding Pending Omnibus Objections to Claims* [ECF No. 14419] (the “Satellite Hearing Procedures Order”) directing the Oversight Board to file (i) any responses that were not filed on the docket and/or (ii) certified translations of any Spanish-language responses to claims that the Debtors intend to prosecute at the hearing to be held on November 18, 2020. Satellite Hearing Procedures Order at 2.

Attached hereto as Exhibit 1 is a certified translation of the response [ECF No. 12234] (the “García Cruz Response”), filed by Miguel Angel García Cruz (“García Cruz”), in response to the *Ninety-Sixth Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment or Services Provided* [ECF No. 9546] (the “Ninety-Sixth Omnibus Objection”).

Attached hereto as Exhibit 2 is a certified translation of the response [ECF No. 10518] (the “Ríos Guadarrama Response”) filed by Hector Enrique Ríos Guadarrama (“Ríos Guadarrama”), in response to the *One Hundred Fourth Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9554] (the “One Hundred Fourth Omnibus Objection”).

Attached hereto as Exhibit 3 is a certified translation of the response, ECF No. 9789 (the “First García Cruz Response”), filed by Alfredo García Cruz (“García Cruz”) in response to the

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

*One Hundred Eleventh Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9561] (the “One Hundred Eleventh Omnibus Objection”).

Attached hereto as Exhibit 4 is a certified translation of the response, ECF No. 9815 (the “Second García Cruz Response,” filed by García Cruz in response to the One Hundred Eleventh Omnibus Objection.

Attached hereto as Exhibit 5 is a certified translation of the response [ECF No. 10519] (the “Ríos Guadarrama Response”) filed by Hector Enrique Ríos Guadarrama (“Ríos Guadarrama”), in response to the *One Hundred Fifteenth Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Unspecified Puerto Rico Statutes* [ECF No. 9565] (the “One Hundred Fifteenth Omnibus Objection”).

Additional responses that were not filed on the docket, as well as certified translations thereof, are being submitted via notices of correspondence submitted contemporaneously herewith.

Courtesy copies of these responses and certified translations will also be e-mailed to chambers in the form of a PDF binder.

WHEREFORE, the Oversight Board respectfully requests that this Honorable Court take notice of the filing of these responses and certified translations in compliance with the Court’s orders.

*[Remainder of page intentionally left blank]*

Dated: November 11, 2020  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen

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